

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

JOSHUA D. WOJTOWICZ and
CLAUDIA WOJTOWICZ, h/w
1703 Coventry Pointe Lane
Pottstown, Pennsylvania 19465

PLAINTIFFS

v.

LANA K. DENCH
5302 Glen Falls Road
Reisterstown, Maryland 21136

DEFENDANT

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: CIVIL ACTION NO. 02-3011
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: SELF EXECUTING DISCLOSURE
: OF PLAINTIFFS
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: JURY TRIAL DEMANDED
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SELF-EXECUTING DISCLOSURE OF PLAINTIFFS

Plaintiffs, by and through their attorney, Michael P. Rowan, Esquire, provide the following Self-Executing Disclosure pursuant to Federal Rule of Civil Procedure 26 and Section 4:01 of the Civil Justice Expense and Delay Reduction Plan:

1. **Names and last known addresses of persons reasonably likely to have information that bears significantly on the claims and defenses, identifying the subjects of the information.**
 - (a) Patrolman J. Lee Badge 127: 401 E. Gay Street, West Chester, PA 19380
 - (b) Joshua D. Wojtowicz: 1703 Coventry Pointe Lane, Pottstown, PA 19465
 - (c) Claudia Wojtowicz: 1703 Coventry Pointe Lane, Pottstown, PA 19465
 - (d) Lana K. Dench: 5302 Glen Falls Road, Reisterstown, MD 21136

During the course of discovery, if additional witnesses are identified that have information relevant to the claims and defenses, Plaintiffs reserve the right to amend this list.

2. **General description of all documents, data, compilations, and tangible things that are likely to bear significantly on the claims and defenses.**

- (a) West Chester Police Accident Report
- (b) Nationwide Mutual Insurance Company Application for Benefits
- (c) Nationwide Mutual Insurance Company Estimate of Record
- (d) Medical Records:
 - a. Chester County Hospital Emergency Department Registration
 - b. Chester County Hospital Short Procedure Unit Outpatient Surgery Registration
 - c. Chester County Hospital Department Radiology
 - d. Chester County Hospital Neurology Services
 - e. T.D. Orthopaedic Consultants
 - f. Stanley R. Askin, M.D.
 - g. Chester County Orthopaedic Associates, Ltd.
 - h. Philip A. Adelman, M.D., P.C.
 - i. Center for Physical Rehabilitation & Sports Medicine
 - j. Myofascial Release Treatment Centers & Seminars
 - k. John Potts, M.D.
- (e) Medical Bills
 - a. Expense Breakdown form Nationwide Mutual Insurance Company
 - b. Good Fellowship Club of Chester County (Ambulance)
 - c. Emergency Care Specialist P.C.

- d. Chester County Hospital
- e. West Chester Anesthesia Associates
- f. U of P Community Radiology Associates
- g. Chester County Orthopaedic Associates, LTD.
- h. Philip A. Adelman, M.D., P.C.
- i. Myofascial Release Treatment Center
- j. EMPI
- k. PennCare West/West Chester Family Practice
- l. Clinical Care Associates
- m. Prescriptions:
 - i. Gladwyne Pharmacy
 - ii. Eckerd Drugs
 - iii. Acme Pharmacy
 - iv. RiteAid

During the course of discovery, if additional documents, data, compilations, and/or tangible things are identified that are relevant to the claims and defenses, Plaintiffs reserve the right to amend this list.

3. A computation of any category of damages claimed by the Plaintiffs.

Plaintiffs seek damages for medical expenses, lost wages, pain and suffering, property damage, as well as interest, costs, and such other and further relief as the Court deems proper.

4. **The existence and content of any insurance agreement under which any person or entity carrying on an insurance business may be liable to satisfy part or all of the judgment that may be entered in the action, or indemnify or reimburse for payments made to satisfy the judgment, making available such agreement for inspection and copying as under Local Civil Rule 26.1.**

(a) State Farm Insurance Companies — State Farm Automobile Policy

5. **The identity of any person who may be used at trial to present expert testimony.**

(a) Richard W. Ziegler, M.D.

(b) Philip Adelman, M.D.

(c) Thomas D. DiBenedetto, M.D.

(d) Stanley R. Askin, M.D.

Plaintiffs have not yet identified or retained any experts to provide expert testimony. If one or more experts are retained, copies of the expert reports will be provided to Defendants.

*Michael P. Rowan, Esquire
Attorney for Plaintiffs
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CERTIFICATION OF SERVICE

I, MICHAEL P. ROWAN, ESQUIRE, attorney for Plaintiffs, certify that true and correct copies of the foregoing Self-Executing Disclosure were served this date upon counsel and unrepresented parties in this action via First Class US Mail, postage prepaid, as follows:

Office of the Clerk
US District Court for the Eastern District of Pennsylvania
2609 United States Court House
601 Market Street
Philadelphia, PA 19106

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Date: _____, 2002